

EXHIBIT 69

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; ELAINE
C. DUKE, in her official capacity; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
and the UNITED STATES OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

DECLARATION OF CAIRO MENDES


I, Cairo Mendes, declare as follows:

1. My name is Cairo Mendes. I am 24 years old. I live in Marlborough, Massachusetts.
2. I have personal knowledge of the matters set forth below.
3. I was born in Goiania, Brazil. When I was 9 years old, my mother brought my sister and me to Massachusetts to join my father who had been working here for two years. My parents always told me that they brought our family to Massachusetts because of the opportunity for a better life – because of the American Dream.
4. I have lived in Marlborough for 15 years. I went to public school in here. I'm now a senior at UMass Boston. I'm studying economics and political science.
5. Receiving DACA has had an enormous impact on my life.
6. I work to help my family and pay for school. Because of DACA, I was able to get a social security card and a work permit. That allowed me find a job that paid more and, for the first time, provided health insurance. I pay state and federal taxes.
7. I commute to work and school every day. Because of DACA, I was able to get a driver's license and a loan to buy a car.
8. I wouldn't be able to attend UMass Boston without DACA. I started college at Mass Bay Community College in 2012 before DACA. It was a huge struggle to pay the tuition. After I received DACA status, I qualified for in-state tuition and was able to afford to enroll in more classes. I graduated from Mass Bay in 2015 and then started at UMass Boston. I still struggle to pay for school, but I couldn't make it work without DACA. If I lost in-state tuition – or my driver's license and work permit – I would have to drop out.

9. Getting DACA status removed the fear and anxiety from my life. It gave me the space to breathe. The only reason I've been able to get this far is because of DACA.
10. Losing DACA would turn my life upside down and hurt my entire family. I could lose my job, my health insurance, and I would have to put my education on hold. I'm my mother's right hand; without DACA I wouldn't be able to help my family in the same way. I could be deported to a country I don't know and haven't lived in since I was a little boy.
11. Eliminating DACA wouldn't just hurt recipients like me, it would destabilize entire families and communities.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 4th day of September, 2017.



Cairo Mendes